

ZEIGER, TIGGES & LITTLE LLP

TELEPHONE: (614) 365-9900  
FACSIMILE: (614) 365-7900

ATTORNEYS AT LAW  
3500 HUNTINGTON CENTER  
41 SOUTH HIGH STREET  
COLUMBUS, OHIO 43215

WRITER'S DIRECT NUMBER:  
(614) 365-4113  
little@litohio.com

June 2, 2023

**SUBMITTED VIA ECF**

Honorable Ann M. Donnelly  
United States District Court Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Courtroom 4GN  
Brooklyn, NY 11201

Re: Jennifer D. Araoz vs. The New Albany Company LLC, et al.  
Case No. 1:22-cv-00125

Dear Judge Donnelly:

Pursuant to Section 4(C) of the Court's Individual Motion Practices and Rules, Defendants request permission to file a reply in support of their Motion to Dismiss pursuant to Rules 12(b)(1), (b)(2) and (b)(6) not to exceed twenty (20) pages. This page extension is necessary to fully brief the numerous failings in Plaintiff's Memorandum in Opposition to Defendants' Motion to Dismiss.

The Court previously granted Defendants' request for a page extension permitting them to file a thirty-five (35) page memorandum in support of their Motion so that Defendants could fully brief the defects in Plaintiff's First Amended Complaint. In response to that Motion, Plaintiff's Memorandum now expands her Complaint to add several new claims under the Trafficking Victims Protection Act and for violation of the Racketeering Influenced and Corrupt Organizations Act. Compounding the problem, she attempts to transform Defendants' Motion to Dismiss into one for summary judgment, attaching roughly five-hundred (500) pages of exhibits to her Memorandum. Plaintiff improperly relies on the factual claims in these exhibits to once again supplement an already-amended Complaint that already exceeds two-hundred and sixty (260) paragraphs in length.

Defendants seek a complete opportunity to respond. Accordingly, Defendants respectfully request that they be allotted twenty (20) pages for the reply in support of their Motion to Dismiss.

ZEIGER, TIGGES & LITTLE LLP

Honorable Ann M. Donnelly  
June 2, 2023  
Page 2

We appreciate the Court's attention to this matter.

Very truly yours,

Marion H. Little, Jr.

cc: Robert J. Hantman, Esq. (via email)  
Nyall J. Cook, Esq. (via email)